

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Case No. 4:23-CV-09
)	
\$115,800.00 IN U.S. CURRENCY)	
FUNDS SEIZED FROM SOUTH)	
GEORGIA BANK ACCOUNT)	
ENDING IN 0378, et al.)	
)	
Defendant.)	
)	

REQUEST TO ENTER DEFAULT

To: Clerk of Court for the United States District Court for the Southern District of Georgia

Plaintiff, the United States of America, hereby requests that you enter default, pursuant to Rule 55(a), Fed. R. Civ. P., against all potential known claimants, including:

- Brian Thomas Rafferty, Esq.;
- Jeffrey Derby;
- Donald Franklin Samuel, Esq.;
- Christopher Ryan Barnes;
- Rony Denis;
- Marjorie Robertson Denis;
- South Georgia Bank, Attn: Jay W. Hales;
- Gerald Robertson;
- Anthony S. Oloans;

- James B. Benton;
- Steven Sadow, Esq.;
- United States Department of Veteran Affairs, Debt Management Center
189, Attn: Julie Lawrence;
-
- Dennis Nostrant;
- Marcus Labat;
- First Citizens Bank and Trust, Attn: Sharon Crabbe;
- House of Prayer Christian Churches of America, Inc.; and
- Phebe Ruth Denis

(collectively, hereinafter, “all known potential claimants”) and their heirs, successors, and assigns; and all other persons and entities having an interest in the Defendants *In Rem* listed in the Verified Complaint (hereinafter, collectively the “**Defendant Property**”) which represent the following assets:

1. \$115,800.00 in U.S. Currency Funds from South Georgia Bank Account ending in 0378;
2. \$21,263.24 in U.S. Currency Funds from First Citizens Bank and Trust Account ending in 2757;
3. \$6,715.85 in U.S. Currency Funds from First Citizens Bank and Trust Account ending in 2888;
4. \$3,168.33 in U.S. Currency Funds from First Citizens Bank and Trust Account ending in 2837;
5. \$578.84 in U.S. Currency Funds from First Citizens Bank and Trust Account ending in 2896; and
6. \$2,665.53 in U.S. Currency Funds from South Georgia Bank Account ending in 0360,

based on their failure to file a timely claim or answer or to otherwise appear within the time period permitted by Rule G(5), Supplemental Rules for Certain Admiralty or Maritime Claims and Asset Forfeiture Actions, and 18 U.S.C. § 983(a)(4)(A).

The facts surrounding this request are set forth in the enclosed affidavit, attached hereto and incorporated herein by reference.

Respectfully Submitted this 23rd day of May 2023.

JILL E. STEINBERG
UNITED STATES ATTORNEY

By: /s/ J. Bishop Ravenel
J. Bishop Ravenel
Assistant United States Attorney
Virginia Bar No. 70250
Post Office Box 8970
Savannah, Georgia 31412
Telephone: (912) 652-4422
Email: bishop.ravenel@usdoj.gov